

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**CIVIL ACTION NO. 04-11578 PBS**

FIREMAN'S FUND INSURANCE COMPANY  
As Subrogee of Hodan Properties, Inc.,

Plaintiff

v.

FIRE SYSTEMS, INC., FIRE SUPPRESSION  
SYSTEMS OF NEW ENGLAND, INC., PRO  
CON, INC., and PAQUETTE ELECTRIC  
COMPANY, INC.

Defendants

**PAQUETTE ELECTRIC CO., INC.  
EXPERT DISCLOSURE**

Pursuant to Fed. R.Civ.P. 26(a)(2), Paquette Electric Co., hereby identifies Scott Duplisea of TEC Controls as a person who may offer evidence under Rules 702, 703 or 705 of the Federal Rules of Evidence. Mr. Duplisea has not been retained or employed for this purpose. Thus, Rule 26(a)(2)(B) is inapposite. In any event, no report exists. Mr. Duplisea's subject matter, opinions, if any, and experience are as set forth in his deposition and C.V. produced and marked as an exhibit.

Paquette has retained and may elicit testimony from expert David Bouchard, P.E., in accordance with the disclosure made by Fire Suppression Systems of New England, Inc. and his report served therewith.

By its Attorneys,

Date: May 1, 2006

s/ David D. Dowd, Esquire  
David D. Dowd, BBO No. 132660  
Curley & Curley, PC  
27 School Street  
Boston, MA 02108  
(617) 523-2990/(617) 523-7602 fax

**Certificate of Service**

I, David D. Dowd, hereby certify that a true copy of the foregoing pleading was served by first class mail, postage prepaid, directed to:

Erik Loftus, Esquire  
Law Offices of Stuart G. Blackburn  
Two Concorde Way  
P.O. Box 608  
Windsor Locks, CT 06096  
(Counsel for Fireman's Fund Insurance  
Company a/s/o Hodan Properties, Inc.)

Gordon L. Sykes, Esquire  
Morrison, Mahoney & Miller  
10 North Main Street  
Fall River, MA 02722  
(Counsel for Fire Systems, Inc.)

Jocelyn M. Sedney, Esquire  
Brody Hardoon Perkins & Kesten  
One Exeter Plaza  
Boston, MA 02116  
(Counsel for Fire Suppression  
New England, Inc.)

Kathleen C. Tulloh Brink, Esquire  
Law Offices of Jacqueline L. Allen  
262 Washington Street, Suite 601  
Boston, MA 02108  
(Counsel for Pro Con, Inc.)

Date: May 1, 2006

s/ David D. Dowd, Esquire  
David D. Dowd